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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

MAY 16 2023

SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

4:23-CR-6017-SAB

Plaintiff,

INDICTMENT

v.

Vio: 18 U.S.C. § 2422(b)

Online Enticement

(Count 1)

CHANSE JACOB HARMELLE (a/k/a  
"Max"),

18 U.S.C. § 2251(a), (e)

Production of Child

Pornography

(Count 2)

Defendant.

18 U.S.C. § 1591(a)(1), (b)(2)

Child Sex Trafficking

(Count 3)

18 U.S.C. § 2428, 18 U.S.C.

§ 2253, 18 U.S.C. § 1594

Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Between on or about June 10, 2020, and on or about June 3, 2022, in the

Eastern District of Washington, the Defendant, CHANSE JACOB HARMELLE

INDICTMENT – 1

1 (a/k/a “Max”), did knowingly use a facility and means of interstate and foreign  
2 commerce to persuade, induce, entice, and coerce Minor M, an individual who  
3 had not attained the age of 18 years, to engage in prostitution or any sexual  
4 activity for which a person can be charged with a criminal offense, including  
5 WASH. REV. CODE § 9A.44.079, Rape of a Child in the Third Degree, all in  
6 violation of 18 U.S.C. § 2422(b).  
7  
8

9  
10 COUNT 2

11 Between on or about June 10, 2020, and on or about June 3, 2022, in the  
12 Eastern District of Washington, the Defendant, CHANSE JACOB HARMELLE  
13 (a/k/a “Max”), did knowingly employ, use, persuade, induce, entice, and coerce a  
14 minor, namely Minor M, to engage in sexually explicit conduct as defined in 18  
15 U.S.C. § 2256(2)(A), for the purpose of producing any visual depiction of such  
16 conduct, knowing and having reason to know such visual depiction would be  
17 transported and transmitted using any means and facility of interstate and foreign  
18 commerce, and in and affecting interstate and foreign commerce; and such visual  
19 depiction having been produced using materials that had been mailed, shipped,  
20 and transported in and affecting interstate and foreign commerce by any means,  
21 including by computer; and such visual depiction was actually transported and  
22 transmitted, using any means and facility of interstate and foreign commerce, and  
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1 in and affecting interstate and foreign commerce, all in violation of 18 U.S.C.  
2 § 2251(a), (e).  
3

4 COUNT 3

5 Between on or about June 10, 2021, and on or about June 3, 2022, in the  
6 Eastern District of Washington, the Defendant, CHANSE JACOB HARMELLE  
7 (a/k/a “Max”), in and affecting interstate and foreign commerce, did knowingly  
8 recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize,  
9 and solicit by any means a person, namely Minor M, knowing and in reckless  
10 disregard of the fact, and having had a reasonable opportunity to observe Minor  
11 M, that Minor M had not attained the age of 18 years and would be caused to  
12 engage in a commercial sex act, in violation of 18 U.S.C. §1591(a)(1), (b)(2).  
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17 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

18 The allegations contained in this Indictment are hereby realleged and  
19 incorporated by reference for the purpose of alleging forfeitures.  
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21 Pursuant to 18 U.S.C. § 2428, upon conviction of an offense in  
22 violation of 18 U.S.C. § 2422, the Defendant, CHANSE JACOB  
23 HARMELLE (a/k/a “Max”), shall forfeit to the United States of America,  
24 any property, real or personal, that was used or intended to be used to  
25 commit or to facilitate the commission of the offense and any property, real  
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1 or personal, constituting or derived from any proceeds obtained, directly or  
2 indirectly, as a result of the offense.  
3

4 If any of the property described above, as a result of any act or omission of  
5 the Defendant:  
6

- 7 a. cannot be located upon the exercise of due diligence;
- 8 b. has been transferred or sold to, or deposited with, a third party;
- 9 c. has been placed beyond the jurisdiction of the court;
- 10 d. has been substantially diminished in value; or
- 11 e. has been commingled with other property which cannot be divided  
12 without difficulty,

13 the United States of America shall be entitled to forfeiture of substitute property  
14 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c)  
15

16 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in  
17 violation of 18 U.S.C. § 2251(a), (e), as alleged in this Indictment, the  
18 Defendant, CHANSE JACOB HARMELLE (a/k/a “Max”), shall forfeit to  
19 the United States of America any visual depiction described in section 2251,  
20 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book,  
21 magazine, periodical, film, videotape, or other matter which contains any  
22 such visual depiction, which was produced, transported, mailed, shipped or  
23 received in violation of this chapter; any property, real or personal,  
24 constituting or traceable to gross profits or other proceeds obtained from  
25 such offenses; and, any property, real or personal, used or intended to be  
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1 used to commit or to promote the commission of such offenses, or any  
2 property traceable to such property.  
3

4 If any of the property described above, as a result of any act or omission of  
5 the Defendant:  
6

- 7 a. cannot be located upon the exercise of due diligence;
- 8 b. has been transferred or sold to, or deposited with, a third party;
- 9 c. has been placed beyond the jurisdiction of the court;
- 10 d. has been substantially diminished in value; or
- 11 e. has been commingled with other property which cannot be divided  
12 without difficulty,

13 the United States of America shall be entitled to forfeiture of substitute property  
14 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).  
15

16 Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of  
17 18 U.S.C. § 1591, the Defendant, CHANSE JACOB HARMELLE (a/k/a “Max”),  
18 shall forfeit to the United States of America any property, real or personal,  
19 involved in, used, or intended to be used to commit or to facilitate the commission  
20 of the offense[s], and any property traceable to such property; and any property,  
21 real or personal, constituting or derived from, any proceeds obtained, directly or  
22 indirectly, as a result of the offense[s], and any property traceable to such property.  
23  
24  
25

26 If any of the property described above, as a result of any act or omission of  
27 the Defendant  
28

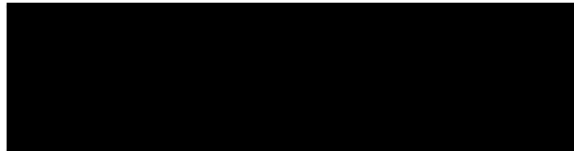
- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

DATED this 16 day of May, 2023.

A TRUE BILL



*Vanessa R. Waldref*

Vanessa R. Waldref  
United States Attorney

*Laurel J. Holland*

Laurel J. Holland  
Special Assistant United States Attorney